

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Bay State Gas Company)	
)	D.T.E. 06-42
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**ATTORNEY GENERAL'S SECOND SET OF
INFORMATION AND DOCUMENT REQUESTS**

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| AG-2-1 | Please provide documentation to support Bay State Gas Company's ("Bay State" or "Company") assertion that its acquisition of the Vector Pipeline L.P. ("Vector") transportation capacity and the Washington 10 Storage Corporation ("Washington 10") natural gas storage would be consistent with the Company's most recently approved long-range forecast. Provide updated resource and requirements schedules and/or tables that includes (a) the transportation capacity that the Company holds pursuant to the Union Gas ("Union") and TransCanada Pipelines ("TCPL") contracts, (b) the Vector transportation capacity, and (c) the Washington 10 storage. |
| AG-2-2 | Please provide copies of all currently approved tariffs that relate to pricing under the terms of the proposed contract with Vector. |
| AG-2-3 | Please provide copies of all currently approved tariffs that relate to pricing under the terms of the proposed contract with Washington 10. |
| AG-2-4 | Please provide a copy of the interim agreement(s) with Vector. |
| AG-2-5 | Please provide copies of all agreements between the Company and Vector and/or DTE Energy Company and any affiliate of these companies. Include the original agreements and all amendments. |
| AG-2-6 | Please provide copies of all agreements between the Company and its affiliates that govern the sharing or sale of Bay State's gas portfolio resources including commodity, capacity and storage. Include all original, existing, expired and terminated agreements, agreement amendments, and any attachments to these agreements. Also include all pricing requirements. |

- AG-2-7 Please provide the Company's reason(s) for seeking approval from the Department of Telecommunications and Energy for exclusion of the proposed Vector and Washington 10 resources from the Company's mandatory capacity assignment resources.
- AG-2-8 Please provide a detailed explanation for the Company's exclusion of Union and TransCanada transportation capacity from the Company's mandatory capacity assignment resources.
- AG-2-9 Identify any additional costs customers would pay if the Company assigned the Vector and Washington 10 resources, and the Union and TransCanada resources to eligible migrating customers. Provide all supporting documentation, calculations, work papers, and assumptions.
- AG-2-10 State the estimated capacity release revenue for the release of the Vector capacity. Provide all supporting documentation, work papers, calculations and assumptions and include actual capacity release data for Vector.
- AG-2-11 State any and all circumstances under which the Company would not maintain maximum storage levels at the Washington 10 storage facility going into the peak season. Please explain each circumstance.